

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ORANGEBURG DIVISION

JOEL GRIFFITH, on Behalf of Himself,]
and All Others Similarly Situated,]
] Plaintiff,]
] vs.] Civil Action No.: 5:15-3668-TLW
] AIR METHODS CORPORATION and]
ROCKY MOUNTAIN HOLDINGS, LLC,]
] Defendants.]

PLAINTIFF'S RESPONSES TO LOCAL RULE 26.01 INTERROGATORIES

PLAINTIFF Joel Griffith, by and through his undersigned counsel of record, answers Local Rules 26.01 Interrogatories, and responds as follows:

(A) State the full name, address, and telephone number of all persons or legal entities who may have subrogation interest in each claim and state the basis and extent of said interest.

ANSWER: The following entities may have subrogation interests against the Plaintiff's claims:

None at this time.

(B) As to each claim, state whether it should be tried by jury or nonjury and why.

ANSWER: Plaintiff's claims for breach of contract and for violation of South Carolina Unfair Trade Practices Act are legal and should be tried to a jury. Claims for Declaratory and Injunctive Relief are equitable and should be tried nonjury.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns 10 percent or more of the outstanding shares.

ANSWER: Plaintiff is not a publicly owned company.

(D) State the basis for asserting a claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

ANSWER: Venue is proper in this division as the acts and/or omissions of the Defendant occurred in the Orangeburg Division.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so: provide (1) a short caption and full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any action that may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER: Adams v. Air Methods Corporation and Rocky Mountain Holdings, LLC, 3:15CV1683-TLW, the Honorable Terry L. Wooten. These actions are related in that they seek relieve on behalf of the same class of individuals. The related action has a pending Motion to Strike Class Allegations and has not yet had a scheduling order issued.

Respectfully Submitted, this 14th day of September, 2015.

Respectfully submitted:

/s/ J. Preston Strom, Jr.
Strom Law Firm, LLC
J. Preston "Pete" Strom, Jr. (Fed Id # 4354)
Mario A. Pacella, (Fed Id. # 7538)
John R. Alphin, (Fed Id. # 9923)
2110 N. Beltline Boulevard
Columbia, South Carolina 29204
Tel: (803) 252-4800
Fax: (803) 252-4801
petestrom@stromlaw.com
mpacella@stromlaw.com
japhin@stromlaw.com

Richardson, Patrick,
Westbrook & Brickman, L.L.C.
Terry E. Richardson, Jr. (#3457)
E-Mail: trichardson@rpwb.com
Daniel S. Haltiwanger (#7544)
E-Mail: dhaltiwanger@rpwb.com
P. O. Box 1368
1730 Jackson Street
Barnwell, SC 29812
Telephone No.: (803) 541-7850
Fax No.: (803) 541-9625